

STATEMENT OF BASIS (AI No. 148871)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0122734 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Redfish Rental of Fourchon, Inc.
696 A.O. Rappelet Road
Golden Meadow, LA, 70357

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Maxon Graham

DATE PREPARED: 26 February 2007

1. PERMIT STATUS

- A. Reason For Permit Action: First time issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.
- B. NPDES permit - NPDES permit effective date: N/A
NPDES permit expiration date: N/A
EPA has not retained enforcement authority.
- C. LPDES permits - LPDES permit effective date: N/A
LPDES permit expiration date: N/A
- D. Date Application Received: 12 February 2007

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - Oilfield Service Rental Facility

This facility rents heavy equipment and other types of construction and maintenance equipment to various industries such as the oilfield industry, construction, and private individuals. The equipment is brought back to the facility after use and washed down and routine maintenance performed.

B. FEE RATE

- 1. Fee Rating Facility Type: minor
- 2. Complexity Type: II - BPJ to 0 points due to low flow volume, and BPJ from 10 points to 0 points to be closer to the fee for coverage under the general permit, LAG480000
- 3. Wastewater Type: II
- 4. SIC code: 7353 and 1389

C. LOCATION - 696 A.O. Rappelet Road, Golden Meadow, Lafourche Parish Latitude 29° 07' 07", Longitude 90° 11' 38"

Statement of Basis for
Redfish Rental of Fourchon, Inc.
LA0122734, AI No. 148871
Page 2

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: Exterior Vehicle and Equipment Wash Wastewater
Treatment: Oil and Water Separator
Location: at the point of discharge from the oil and water separator at the rear of the facility
Flow: 1200 gpd maximum
Discharge Route: via local drainage to Pass Fourchon

Outfall 002

Discharge Type: Treated Sanitary Wastewater
Treatment: Chlorination
Location: at the point of discharge from the sewage treatment plant on the front southwest corner of the facility
Flow: 300 gpd
Discharge Route: via local drainage to Pass Fourchon

4. RECEIVING WATERS

STREAM - via local drainage to Pass Fourchon

BASIN AND SEGMENT - Barataria Basin, Segment 020905

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife
e. oyster propagation*

* Oyster Propagation is listed as a designated use of subsegment 020905 (Bayou Moreau). However, this designated use is applicable only if the discharge is directly into the named waterbody and not into a tributary or distributary of the waterbody per LAC 33:IX.1111.E.

5. TMDL STATUS

Subsegment 020905, Bayou Moreau, is not listed on LDEQ's Final 2004 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

6. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

7. COMPLIANCE HISTORY/COMMENTS

- A. Compliance History - No records of compliance actions were found.
B. DMR Review - No DMR data were available for review since this is a first time issuance.

Statement of Basis for
Redfish Rental of Fourchon, Inc.
LA0122734, AI No. 148871
Page 3

8. ENDANGERED SPECIES

The receiving waterbody, Subsegment 020905 of the Barataria Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated September 29, 2006 from Watson (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

9. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

10. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

11. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

Statement of Basis for
 Redfish Rental of Fourchon, Inc.
 LA0122734, AI No. 148871
 Page 4

Rationale for Redfish Rental of Fourchon, Inc.

Outfall 001 – exterior vehicle and equipment wash wastewater, estimated flow is 1200 gpd (max.)

Parameter	Limitation		Reference
	Monthly Average	Daily Maximum	
Flow	Report	Report	LAG750000; BPJ*; similar discharges
TSS	---	45 mg/L	LAG750000; BPJ*; similar discharges
COD	---	300 mg/L	LAG750000; BPJ*; similar discharges
Oil and Grease	---	15 mg/L	LAG750000; BPJ*; similar discharges
pH – Allowable Range (s.u.)	6.0 (minimum)	9.0 (maximum)	LAG750000; BPJ*; similar discharges
Soaps and/or Detergents	Report	N/A	LAG750000; BPJ*; similar discharges
Visible Sheen	---	No Presence	LAG750000; BPJ*; similar discharges

Treatment: water goes into sump for initial separation and then through an oil and water separator before discharge

Monitoring Frequency: Visible Sheen shall be monitored daily and all other parameters monitored quarterly.

Limits Justification: the limits and monitoring frequencies for this permit are based on BPJ, current guidance for similar discharges from other industrial facilities and the Exterior Vehicle Wash Wastewater Permit, LAG750000, effective March 15, 2004. . EPA Guidelines for Metal Products and Machinery (40 CFR Part 438) are applicable; however, more stringent state requirements are being placed in the permit.

Outfall 002 - treated sanitary wastewater, estimated flow is 300 gpd

Parameter	Limitation		Reference
	Monthly Average	Weekly Average	
BOD ₅	---	45 mg/L	LAG530000; similar discharges
Fecal Coliform Colonies/100 mL	---	400	LAG530000; similar discharges
Flow	---	Report	LAG530000; similar discharges
TSS	---	45 mg/L	LAG530000; similar discharges
pH – Allowable Range (su)	6.0 (min)	9.0 (max)	LAG530000; similar discharges

Statement of Basis for
Redfish Rental of Fourchon, Inc.
LA0122734, AI No. 148871
Page 5

Treatment: chlorination

Monitoring Frequency: semiannually at the point of discharge from the sewage treatment plant prior to mixing with waters of the state.

Limits Justification: limits and monitoring frequencies are based on BPJ, current guidance for similar discharges from other industrial facilities, and the Class I Sanitary General Permit, LAG530000 effective December 1, 2002

* Existing permits for similar outfalls
BPJ Best Professional Judgement
su Standard Units

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water shall not be required to obtain and LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC code 1389 are considered to have storm water discharges associated with industrial activity.

The SWP3 shall be prepared, implemented, and maintained within (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in the storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).